

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN DOE,

Plaintiff,

v.

HARVARD UNIVERSITY, HARVARD
UNIVERSITY BOARD OF OVERSEERS,
THE PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, and BRIGID
HARRINGTON, in her individual and official
capacity,

Defendants.

Civil Action No. 1:18-cv-12150-IT

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND
SUMMARY JUDGMENT DEADLINES**

Defendants Harvard University and The President and Fellows of Harvard College (“Harvard”),¹ with Plaintiff’s assent, request an extension of the current deadlines for the filing of summary judgment motions. In support of this Motion, Defendants respectfully state:

1. The current summary judgment briefing schedule set by the Court is as follows:
 - a. Summary judgment motions due March 30, 2021;
 - b. Any oppositions briefs due April 30, 2021; and
 - c. Any reply briefs due May 21, 2021.

2. Defendants have worked diligently to meet these deadlines, but several issues have caused unexpected delay. These include deadlines in other litigation matters, and

¹ On December 5, 2018, Defendant Harvard University Board of Overseers was voluntarily dismissed as a defendant. *See* Dkt. No. 14. On May 28, 2020, the court dismissed Investigator Harrington as a defendant in this case. *See* Dkt. No. 68.

complications attendant to gathering information from a number of individuals working remotely and subject to limitations caused by the Covid-19 pandemic.

3. Accordingly, Defendants respectfully request that the Court adjust the briefing schedule as follows:

Deadlines	Current Date	Proposed Date
Summary Judgment motions due	March 30, 2021	April 30, 2021
Opposition briefs due	April 30, 2021	May 28, 2021
Reply briefs due	May 21, 2021	June 21, 2021

4. Defendants have not previously requested an extension regarding the foregoing deadlines.

5. Defendants have conferred with Plaintiff, who has indicated, through counsel, that he does not oppose the relief requested herein.

6. Finally, no party will be prejudiced by the Court granting the relief requested herein.

WHEREFORE, Defendants respectfully request, with Plaintiff's assent, that the Court grant this motion and adjust the deadlines as described above.

Dated: March 19, 2021

Respectfully submitted,

/s/ Apalla U. Chopra

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Fellows of Harvard College*

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred in good faith with counsel for Plaintiff regarding the foregoing Motion. Plaintiff, through counsel, has indicated that he assents to the relief requested in this Motion.

/s/ Apalla U. Chopra

Apalla U. Chopra

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 19, 2021.

/s/ Apalla U. Chopra

Apalla U. Chopra